

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEFINITION SERVICES INC., a British Virgin Islands corporation,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 21-cv-00741-JLH
)	
GVA CAPITAL LTD., a Cayman Islands exempted company,)	
)	
)	
Defendant.)	
)	

**NINTH JOINT STIPULATION AND ~~PROPOSED~~
ORDER STAYING PROCEEDINGS**

WHEREAS, on October 27, 2022, the Court entered a scheduling order in this matter (D.I. 85);

WHEREAS, on February 7, 2023, Plaintiff Definition Services Inc. (“Definition”) moved for a temporary stay of these proceedings (D.I. 90-92, 94) (the “Motion to Stay”), which motion was opposed by Defendant GVA Capital Ltd. (“GVA”) (D.I. 93);

WHEREAS, on March 28, 2023, the parties stipulated to a stay of these proceedings for 30 days, which the Court so-ordered on March 28, 2023 (D.I. 104-05) (the “First Stipulated Stay”);

WHEREAS, during the First Stipulated Stay, GVA applied for a license from the Office of Foreign Assets Control (“OFAC”) to engage in settlement negotiations with Definition regarding the assets at the center of the dispute in this case, which assets are currently blocked by OFAC;

WHEREAS, following the expiration of the First Stay, on May 2, 2023, the Court denied Definition’s Motion to Stay (D.I. 109);

WHEREAS, on May 26, 2023, the parties stipulated to a proposed amended scheduling order, which was so-ordered by the Court on May 30, 2023 (D.I. 124) (the “Amended Scheduling”

Order”);

WHEREAS, following entry of the Amended Scheduling Order, on July 11, 2023, GVA and Definition stipulated to a second stay of these proceedings for a period of six (6) months, and adjourning all pretrial deadlines in order for the parties to address OFAC-related issues related to these proceedings, which stipulation the Court so-ordered on July 12, 2023;

WHEREAS, on December 8, 2023, GVA and Definition stipulated to a third stay of these proceedings for a period of six (6) months, and adjourning all pretrial deadlines in order for the parties to address OFAC-related issues related to these proceedings, which stipulation the Court so-ordered on December 14, 2023;

WHEREAS, on December 18, 2023, OFAC issued License No. MUL-2023-1052303-1 enabling the parties to negotiate a settlement of this matter;

WHEREAS, on May 14, 2024, GVA and Definition stipulated to a fourth stay of these proceedings for a period of sixty (60) days, which stipulation the Court so-ordered on May 15, 2024 (D.I. 143);

WHEREAS, on June 20, 2024, GVA and Definition stipulated to a fifth stay of these proceedings for a period of ninety (90) days, which stipulation the Court so-ordered on June 21, 2024 (D.I. 148);

WHEREAS on September 4, 2024, GVA and Definition stipulated to a sixth stay of these proceedings for a period of ninety (90) days, which stipulation the Court so-ordered on September 6, 2024 (D.I. 150);

WHEREAS, on January 21, 2025, GVA and Definition stipulated to a seventh stay of these proceedings until March 24, 2025, which stipulation the Court so-ordered on January 22, 2025 (D.I. 152);

WHEREAS, on March 10, 2025, GVA and Definition stipulated to an eighth stay of these proceedings until June 24, 2025, which stipulation the Court so-ordered on March 12, 2025 (D.I. 154); and

WHEREAS, the parties are engaged in productive settlement discussions and agree that the stay should be extended until July 24, 2025 to afford the parties time to finalize a settlement resolving the matter and removing it from the Court's docket;

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Definition and GVA, subject to the approval of the Court, that:

- (1) This matter is temporarily stayed until July 24, 2025;
- (2) All pre-trial deadlines in the Amended Scheduling Order, as well as the trial date, continue to be adjourned; and
- (3) On July 10, 2025, the parties shall jointly file an update to the Court including a proposed pre-trial schedule.

Dated: June 24, 2025

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale
Joseph C. Barsalona II (DE Bar No. 6102)
Alexis R. Gambale (DE Bar No. 7150)
824 N. Market Street, Suite 800
Wilmington, DE 19801
(302) 592-6497
jbarsalona@pashmanstein.com
agambale@pashmanstein.com
Joshua N. Paul (*pro hac vice*)
Andrew H. Elkin (*pro hac vice*)
Gabriel Santos Neves (*pro hac vice*)
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, NY 10019
212.506.1700

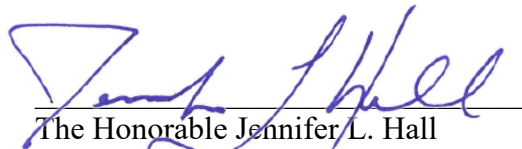
*Attorneys for Plaintiff
Definition Services Inc.*

DLA PIPER LLP (US)

/s/ Kelly L. Freund
R. Craig Martin (DE Bar No. 5032)
Kelly L. Freund (DE Bar No. 6280)
1201 N. Market Street, Suite 2100
Wilmington, DE 19801
302.468.5700
craig.martin@us.dlapiper.com
kelly.freund@us.dlapiper.com

*Attorneys for Defendant
GVA Capital Ltd.*

IT IS SO ORDERED this 25th day of June 2025.


The Honorable Jennifer L. Hall
United States District Judge